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2 UNITED STATES DISTRICT COURT
3 SOUTHERN DISTRICT OF NEW YORK
4 -----x

5 ANUCHA BROWNE-SANDERS,

6 Plaintiff,

7 vs.

No. 06 Civ. 0589

(GEL) (DF)

MADISON SQUARE GARDEN, L.P.,

8 ISIAH LORD THOMAS, III,

9 and JAMES DOLAN,

Defendants.
10 -----x
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14 February 26, 2007

15 10:11 a.m.
16

17 Videotaped deposition of BARRY
18 WATKINS, held at the offices of Vladeck,
19 Waldman, Elias & Engelhard, P.C., 1501
20 Broadway, New York, New York, pursuant to
21 notice, before Cary N. Bigelow, RPR, a
22 Notary Public of the State of New York.
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24
25

1. Watkins

2. they said to the press?

3. A. I don't think so, no.

4. Q. Had you discussed it with them, what
5. they were going to say to the press?

6. A. Yeah, sure. We discussed that they
7. were going to give the statements out to every
8. media person that called in.

9. Q. Apart from the statements, were they
10. also giving the reporters information on
11. background that wasn't in the statement?

12. A. I don't know. I don't think so. I
13. think it was basically just sticking to this
14. defensive strategy.

15. Q. At any point do you know whether Dan
16. Klores Communications, any of the employees of
17. Dan Klores giving information to the media on
18. background that wasn't contained in the official
19. statements?

20. A. I don't know.

21. Q. Are you aware, did Madison Square
22. Garden or anyone acting on Madison Square
23. Garden's behalf provide the media with any
24. derogatory information about Miss Browne-Sanders
25. that wasn't part of the official statements

Watkins

issued by the Garden?

A. No.

MR. GREEN: Objection to form.

You may answer.

A. No. Like I said, we released various statements in response to Anucha's press campaign and on background with people that I had relationships with, I certainly would explain the statement and, you know, just reiterate the fact that she was looking for money here and it was baseless accusations and I may have said that I saw her with Isiah quite a bit and saw lots of mutual hugging and things like that, but as far as anything inflammatory, no, I don't think I'm aware of anything.

Q. Who did you speak to on background?

A. Excuse me?

Q. Who were the reporters -- you just mentioned that you spoke to some reporters on background you had close relationships with; I'm asking who they are.

A. You asked me a couple of names and I gave you the answers. I don't remember exactly, but the Knick writers that would call in, you

Watkins

people from his office?

A. Yes.

Q. Anyone in particular?

A. I don't remember exactly which lawyers were there. I am not sure I knew who everybody who was in the room, but there were lawyers from, I think, from Ron's office, I don't remember, lawyers from the Garden, lawyers from Peter's office or consultants.

Q. Approximately how many people were part of that second meeting that was crafting this statement?

A. Eight, 10, maybe.

(Watkins Exhibit 2, document bearing production No. MSG 6197, marked for identification, as of this date.)

Q. Mr. Watkins, why don't you read this document, which for the record is MSG 6197, which has been marked as Watkins Exhibit 2 for identification.

A. Okay.

Q. Is this an e-mail you received from Mary Pat Clarke?

A. Yes.

Watkins

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Q. It discusses the press coverage of
Anucha Browne-Sanders' lawsuit?

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A. Right.

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Q. Can I ask you to look in the first
paragraph, the third sentence, it says, "During
the day we conducted significant background with
media to refute the allegations, focusing most
specifically on the fact that this is all about
money."

11

Do you see that?

12

A. Uh-huh.

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Q. What's the significant background that
Miss Clarke was referring to here, if you know?

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A. It's exactly what I said earlier, when
the sports media would call in and the people we
had relationships with, we would do two things,
we would give them the numbers to Klores to call
to get the official statement and on background
we would set the record straight and speak to
the fact that it was about money and it was
baseless and we would be proven in court that it
was right.

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Q. I am sorry, that what?

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A. I said that we'd be proven in court